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6 *Attorney for Plaintiffs*

7 UNITED STATES DISTRICT COURT

8 DISTRICT OF NEVADA

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10 TAYLOR SOMMER, individually; TAYLOR  
11 SOMMER, as the Administrator of the ESTATE  
12 OF REINER SHAWN SOMMER, deceased,

13 Plaintiffs,

14 vs.

15 CITY OF LAS VEGAS, NEVADA, a political  
16 subdivision of the State of Nevada; LAS  
17 VEGAS METROPOLITAN POLICE  
18 DEPARTMENT, a political subdivision of the  
19 State of Nevada; JOE LOMARDO, individually  
20 and as a policy maker and Sheriff of LAS  
21 VEGAS METROPOLITAN POLICE  
22 DEPARTMENT; SERGEANT GERALD  
23 BAGAPORO, individually and in his official  
24 capacity; SERGEANT JEFFREY BLUM,  
25 individually and in his official capacity;  
26 OFFICER ANDREW GARCIA, individually  
27 and in his official capacity; OFFICER JOSEPH  
ORTEGA, individually and in his official  
28 capacity; DOE LAS VEGAS METROPOLITAN  
POLICE DEPARTMENT SUPERVISORS I  
through X, inclusive; ROE LAS VEGAS  
METROPOLITAN POLICE DEPARTMENT  
OFFICERS XI through XX, inclusive,

Defendants.

Case No.: 2:23-cv-01682-GMN-NJK

**STIPULATION TO EXTEND TIME TO  
FILE PROPOSED JOINT PRETRIAL  
ORDER (THIRD REQUEST)**

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COMES NOW, Plaintiff, TAYLOR SOMMER, individually, and TAYLOR SOMMER, as the Administrator of the ESTATE OF REINER SHAWN SOMMER, deceased (*collectively*, “*Plaintiffs*”), and Defendants, LAS VEGAS METROPOLITAN POLICE DEPARTMENT; JOE LOMBARDO; SERGEANT GERALD BAGAPORO; SERGEANT JEFFREY BLUM; OFFICER ANDREW GARCIA; and OFFICER JOSEPH ORTEGA (*collectively*, “*Defendants*”) by and through their undersigned counsel of record, and hereby stipulate and agree as follows:

1. Pursuant to this Court’s Order dated April 22, 2025, the parties hereto were directed to submit a Joint Pretrial Order (“JPTO”) within 30 days, on or before May 23, 2025.
2. On May 22, 2025, the parties submitted a stipulation requesting an extension of time until June 20, 2025, to submit the JPTO. [ECF #47]. Said Stipulation was approved on May 23, 2025. [ECF #48].
3. On June 23, 2025, the parties submitted a second stipulation requesting an extension of time until July 11, 2025, to submit the JPTO. [ECF #49]. Said stipulation was approved on June 25, 2025. [ECF #50].
4. The parties have drafted and exchanged the JPTO but are continuing to revise and finalize it. The parties have been unable to complete it to date for various reasons, including their respective schedules and various other work obligations. Specifically, Mr. Croteau, the Plaintiff’s trial attorney, has been engaged in trial preparation and discovery in other matters which have occupied most of his time.
5. Based upon the foregoing, the parties respectfully request an additional extension of time in which to submit the JPTO until July 18, 2025. The parties expect this to be the final extension requested.

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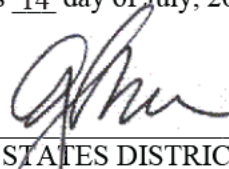
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6. This Stipulation is made in good faith and not for purpose of delay.

DATED this 10<sup>th</sup> day of July, 2025.

ROGER P. CROTEAU & ASSOCIATES, LTD.	MARQUIS & AURBACH
<p><u>/s/ Timothy E. Rhoda</u></p> <p>ROGER P. CROTEAU, ESQ.                      Nevada Bar No. 4958                      TIMOTHY E. RHODA, ESQ.                      Nevada Bar No. 7878                      2810 West Charleston Blvd., #67                      Las Vegas, Nevada 89102                      702-254-7775  <a href="mailto:croteaulaw@croteaulaw.com">croteaulaw@croteaulaw.com</a>  <i>Attorney for Plaintiffs</i></p>	<p><u>/s/ Craig R. Anderson</u></p> <p>CRAIG R. ANDERSON, ESQ.                      Nevada Bar No. 6882                      10001 Park Run Drive                      Las Vegas, Nevada 89145                      702-382-0711  <a href="mailto:canderson@maclaw.com">canderson@maclaw.com</a>  <i>Attorney for Defendants</i></p>

**IT IS SO ORDERED:**  
 Dated this 14 day of July, 2025.

  
 UNITED STATES DISTRICT JUDGE